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Commissioner Jane Henney, M.D.
Food and Drug Administration
5600 Fishers Lane, Room 1471
Rockville, MD 20857

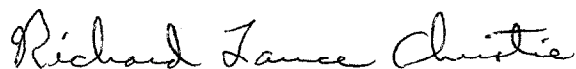
Dear Dr. Henney:

I encourage the FDA to move immediately to ban animal uses of antibiotics which are used in human medicine for animal growth promotion and/or prophylaxis. Led by Sweden and Denmark, the European Economic Union is undertaking this ban. We can look to the results obtained in cost of production and problems with herd management in the vanguard countries of Sweden and Denmark to confirm that this ban has not had any major untoward economic effects on either meat producers or consumers where the ban on agricultural antibiotics has been affected.

Pervasive use of antibiotics in meat animals has been clearly demonstrated to be a major factor in the emergence of increasing numbers of antibiotic-resistant pathogenic bacteria strains. The Centers for Disease Control are on record as considering the agricultural use of antibiotics to be the major cause of antibiotic resistance in food-borne illness. Yet, in this country, some 80% of agricultural antibiotic use is not applied to the treatment of sick animals, but rather is applied prophylactically to enhance growth and alleviate the unhealthy effects of unsanitary, overcrowded "factory farming" meat producing conditions. In balance, allowing this practice clearly does not serve the public health, safety, or welfare.

I am an organic farm inspector. I inspect beef and poultry production operations for certification authorities. No organic certification authority allows meat which has been treated with antibiotics to be sold as "organic." Certification standards call for access to the outdoors, space, and sanitation requirements to be met. From experience, I can testify that organic meat producers have few disease problems, and their costs of production are not excessive. They substitute effective cultural practices for drug and other chemical use. The ability of meat producers to operate profitably and successfully without prophylactic/growth-enhancing antibiotic use is demonstrable both in Europe and the United States today. Since promiscuous agricultural antibiotic use threatens public health, it should be banned immediately.

Sincerely yours,

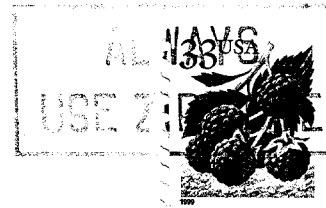


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